

December 10, 2007

The Honorable Susan Golding, Chair MLPA Initiative Blue Ribbon Task Force c/o California Resources Agency 1416 Ninth Street, Suite 1311 Sacramento, CA 95814

Re: NCCRSG Proposals for Pescadero Marsh

Dear Ms. Golding,

I am the Chair of the Steelhead Committee of the Northern California/Nevada Council of the Federation of Fly Fishers (NCCFFF). The NCCFFF is dedicated to the sport of fly fishing and fish conservation. We have approximately 900 regular members with about 6,000 members in affiliated clubs. I request that you include my written comments for the record on behalf of the NCCFFF Steelhead Committee

The tidal estuary of Pescadero Creek has long been a favorite of steelhead anglers from the San Francisco Bay Area and points as far south as Monterey. In the past, when the Pescadero steelhead run has been threatened by illegal or inappropriate logging, agricultural practices, development or over fishing, it has been the angling community that has pressured regulatory agencies to respond and rectify the situation. In fact, it was the angling community that lobbied for the current highly restrictive regulations of no take, barbless hooks, and fishing only on Saturdays, Sundays, Wednesdays, and legal holidays, December through February. It was the angling community that lobbied for summer closure to fishing in the coastal lagoons when it was determined that such activities harmed the juvenile steelhead population. It is clear that the angling community has been a caring and responsible steward of the Pescadero steelhead population, and by extension, the Pescadero marsh upon which the steelhead depend.

Of the six plans developed by the Regional Stakeholder Group, four of them (EA, EB, TA, TB) designate Pescadero Marsh as a State Marine Reserve (SMR) with "No Take" as the designated use. It is unclear whether this "No Take" designation refers to the current regulation of fishing permitted with barbless hooks and zero limit on take, or rather, prohibits all fishing in the SMR. If the latter is case, it is a mistake and we are concerned about the loss of this important recreational opportunity.

The rational given for plans EA and EB is "To protect habitat, steelhead [sic]." Angling in the Pescadero Lagoon consists of the angler wading, sometimes up to thigh deep, on the sandy bottom of the main creek channel casting to deeper water. This activity is not disruptive to the delicate marsh habitat, and any steelhead caught must be immediately released. In spite of its popularity, the angling pressure in the Pescadero lagoon has remained light, so there are rarely



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more than a few anglers on the lagoon at any given time. It is clear that current angling practices in Pescadero Lagoon are not disruptive to the marsh habitat or the steelhead population.

Plans TA and TB also recommend "No Take" with the rational of "Would protect estuary and link to Elkhorn Slough in network. Little impact to rec [sic] fishing if just inside estuary." While we have no argument with the importance of interconnected networks of estuary/marsh habitats, it is unclear how the low impact, limited angling now practiced in Pescadero Marsh, would threaten its "link" to Elkhorn Slough.

In summary, the NCCFFF Steelhead Committee supports protection of the Pescadero Marsh habitat and the Pescadero Creek steelhead population. We hope that the NCCRSG recognizes the low impact that current angling practices have on Pescadero Marsh, and the environmental benefits accrued from a committed and enthusiastic angling community. To this end, we request that the final plan will allow angling in Pescadero Marsh under the current DFG regulations of: no take; barbless hooks; and fishing only on Saturdays, Sundays, Wednesdays, and legal holidays, December through February. We thank the MLPA North Central Coast Regional Stakeholder Group for their work toward a fair and environmentally sound plan for the area.

Respectfully,

Dougald Scott, Chair

Steelhead Committee, NCCFFF

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